

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

V.

**CAROLINA CREEK CHRISTIAN CAMP,
INC.**

Defendant.

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CIVIL ACTION NO. 4:16-cv-03714

JOINT MOTION TO ENTER CONSENT DECREE

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

Plaintiff Equal Employment Opportunity Commission (“Plaintiff”) and Defendant Carolina Creek Christian Camp, Inc. (“Defendant”) (Plaintiff and Defendant are herein collectively referred to as “the Parties”), hereby move the Court to sign and enter the agreed proposed Consent Decree which is filed as Exhibit “1” to this Motion, and which includes Exhibit “A” to the Consent Decree. In support of this Motion, the Parties would show as follows:

1. The Parties have negotiated a resolution to this lawsuit.
2. This lawsuit alleged claims against Defendant under Title VII of the Civil Rights Act of 1964 (“Title VII”), as amended by the Pregnancy Discrimination Act (“PDA”), 42 U.S.C. §§ 2000e(k) and 2000e-2(a)(1), and the Americans with Disabilities Act, as amended (“ADAAA”), 42 U.S.C. § 12101, *et seq.* Defendant denies the claims and allegations that it violated the law, as alleged in the Complaint, and the attached Consent Decree does not

constitute an admission of liability, adjudication of liability, or a finding on the merits of the case. The purposes of Title VII, the PDA, and the ADAAA will be furthered by entry of the Consent Decree.

3. The Consent Decree, if entered by the Court, will resolve to the satisfaction of the Parties all the issues raised in this lawsuit. The Parties therefore request the Court to approve and enter the Consent Decree.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendant jointly and respectfully request that the Court enter the Consent Decree which is filed with this Motion.

Respectfully submitted,

/s/ Connie W. Gatlin

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FOR PLAINTIFF
EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION

/s/ B. Eliot New, by permission CWG

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FOR DEFENDANT
CAROLINA CREEK.
CHRISTIAN CAMP, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Motion to Enter Consent Decree has been served on Defendant's counsel on May 16, 2017, by electronic transmission via the Court's ECF system.

/s/ Connie W. Gatlin
Connie W. Gatlin